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8 Attorneys for Defendants
9 ROBERT JOSEPH BEASLEY, LONGBOAT
10 GLOBAL FUNDS MANAGEMENT, LLC

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

11 COMMODITY FUTURES TRADING
12 COMMISSION,

13 Plaintiff,

14 v.

15 ROBERT JOSEPH BEASLEY, LONGBOAT
16 GLOBAL FUNDS MANAGEMENT, LLC,

17 Defendants.

Case No. C-05-2142 PJH

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DISCOVERY
CUTOFF**

20 Counsel for Plaintiff Commodity Futures Trading Commission and for Defendants
21 Robert Joseph Beasley and Longboat Global Funds Management, LLC stipulate and agree that,
22 with the Court's permission and for the reasons stated herein, the discovery cutoff date be
23 extended from the presently-set date of February 7, 2007 to and including March 5, 2007.

24 Counsel for Defendants Beasley and Longboat represent that the extension is needed for
25 the following reasons:

26 1. On August 15, 2006, a substitution of counsel with this Court was filed on behalf
27 of Defendants Robert Joseph Beasley and Longboat Global Funds Management, LLC.

1 2. In December of this year, the parties by agreement, and with this Court's
 2 approval, continued the mediation of this matter from December 6, 2006 to January 17, 2007
 3 because Mr. Beasley had various scheduling conflicts that precluded his flying from Montana to
 4 San Francisco to attend the previously scheduled mediation, including, *inter alia*, (1) a meeting
 5 with the county planners to discuss and submit a permit for a gravel pit to allow him to begin
 6 gravel extraction on one of his Montana properties, (2) the final walk-through, document signing,
 7 and closing of the Montana real property known as Angel Point (which sold for \$3 million), and
 8 (3) a meeting with California investors regarding the sale of the Montana real property known as
 9 the Sleeping Child Hot Springs (which is listed for \$18 million). The continuation of the
 10 mediation allowed the Angel Point Sale to go through in a timely manner, and generated
 11 approximately \$500,000 (which was wired to the Receiver out of escrow) to pay down the notes
 12 Mr. Beasley personally guaranteed.

13 3. In connection with the continuation of the mediation, and for reasons of efficiency
 14 and economy, the parties (and the Receiver) also agreed to continue Mr. Beasley's deposition
 15 from December 7 to January 18, and hold both the mediation and Mr. Beasley deposition on
 16 consecutive days in San Francisco.

17 4. While the parties are optimistic that the mediation will resolve this matter,
 18 because the current discovery cutoff falls only three weeks after Mr. Beasley's deposition,
 19 counsel for both sides agreed to seek this Court's approval to extend the discovery cutoff for 45
 20 days after Mr. Beasley's deposition – to March 5, 2007 – so that there is adequate time to finish
 21 discovery and file discovery motions should this prove necessary.

22 For the forgoing reasons the parties respectfully request that the discovery cutoff date be
 23 extended to and including March 5, 2007.

24 Dated: January 5, 2007

COLLETTE ERICKSON FARMER & O'NEILL LLP

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/s/ Robert Scott Lawrence

Robert Scott Lawrence

Attorneys for Defendants

Robert J. Beasley and Longboat Global Funds
 Management, LLC

1 Dated: January 5, 2007

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COMMODITY FUTURES TRADING COMMISSION

/s/ Allison P. Lurton
Allison P. Lurton
Attorney for Plaintiff
Commodity Futures Trading Commission

IT IS SO ORDERED this 8th day of January, 2007.

